

EXHIBIT 1-I

Ex. I to Plaintiff's Motion to Extend filed 8-19-20

In the Matter Of:
GOBIND SINGH vs
VANDERBILT UNIVERSITY MEDICAL CENTER
3:17-CV-00400

JUSTIN STERNBERG
May 08, 2019



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Pltf. Ex. I

1 rotation first year as well. And so glaucoma, they
2 work with Dr. Kammer, Dr. Joos, Dr. Kuchtey.

3 Q. Mm-hmm. For residents who successfully
4 complete PGY 3, what is the next step?

5 A. PGY 4.

6 Q. Then what?

7 A. Then they graduate.

8 Q. And their degree is known as what?

9 A. They don't have a degree. They're -- they
10 have a certificate as an ophthalmologist; a trained
11 ophthalmologist, but they still have to pass their
12 Boards before they can practice. They become Board
13 eligible.

14 Q. And after passing the Boards, then they
15 are?

16 A. Board certified ophthalmologists.

17 Q. Do you know what the going rate for a
18 first-year Board certified ophthalmologist is in
19 terms of pay?

20 MR. WRIGHT: Objection to form of the
21 question.

22 You can answer.

23 A. If they do a fellowship, they'll get paid
24 a PGY 5 salary, which is probably somewhere around
25 60 or \$70,000. And then private practice, starting

1 salaries are probably somewhere in the range of 150
2 to 250.

3 Q. Is that in the Nashville market you're
4 speaking of, the 150 to 250 range of starting
5 salary?

6 A. No.

7 MR. WRIGHT: Objection.

8 Q. Where is that?

9 A. That's in the United States.

10 Q. It's a national average?

11 A. That's my -- yes.

12 Q. Okay. Where do you -- what are you basing
13 that on? Just your experience with the market, or
14 have you read some surveys or --

15 A. Both.

16 Q. Okay. What kind of surveys?

17 A. AMGA, AUPO, MGMA.

18 Q. Do you try to keep up with the market rate
19 of salaries so that you can advise residents, or is
20 that just an interest of yours or what?

21 A. Well, first of all, I have to recruit
22 people.

23 Q. Okay.

24 A. So I have to pay them when I hire them.

25 Q. You mean when they're PGY students?